



U.S. Department of Justice

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June 22, 2021

The Hon. Richard D. Bennett  
United States District Court Judge  
101 W. Lombard Street  
Baltimore, Maryland 21201

Re: *United States v. Liberto*  
Crim. No. 1:19-cr-00600-RDB

Dear Judge Bennett:

I have received the letter that Mr. Himeles filed earlier this afternoon. While there is more that I would like to say by way of response to Mr. Himeles's letter, for the moment I will simply provide the Court with a copy of my letter (Exhibit 1) and the 22 previously uncopied pages that we have identified that were inadvertently not copied from the Sierra job files relating to the 31 substantive counts of the indictment (Exhibit 2) back in February and March 2020. We made a complete re-production of all of the pages from the job files relating to the indictment counts so that there would be a consecutive run of Bates numbers, but 378 of those pages were previously produced to the defense between 15 and 16 months ago.

Very Truly Yours,

Jefferson M. Gray

Enclosures:

- Government Counsel's Letter
- Copies of the 22 previously unproduced pages